

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

In re: Genentech, Inc., Herceptin (Trastuzumab) Marketing and Sales Practices Litigation	) ) ) ) )	MDL Docket No. 16-MD-2700 Document Relates to: <b>All Cases</b>
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**PLAINTIFFS' UNOPPOSED MOTION TO SUBSTITUTE**  
**PLAINTIFFS' LEAD COUNSEL**

Plaintiffs move to substitute David L. Bryant for David E. Keglovits as Plaintiffs' Lead Counsel. Plaintiffs state in support thereof:

1. On June 24, 2016, the Court entered Case Management Order #1, which appointed David E. Keglovits and GableGotwals as Plaintiffs' Lead Counsel and Matthew Sill and the Sill Law Group as Plaintiffs' Co-Lead Counsel. (Dkt. #106 at 2). The Court also appointed Mr. Keglovits and Mr. Sill as interim class counsel. (*Id.*).

2. Effective December 31, 2018, Mr. Keglovits will cease to have a professional relationship as a GableGotwals attorney.

3. David L. Bryant has assumed Mr. Keglovits's leadership role with respect to this litigation.

4. Mr. Bryant is a Fellow of the American College of Trial Lawyers who was licensed to practice law in Oklahoma in 1981, and has been a member in good standing of the bar of this Court since 1992. Mr. Bryant has more than 37 years of experience concentrated in complex commercial litigation in federal courts, including multiple MDL matters. Mr. Bryant has filed an entry of appearance in this litigation.

5. Plaintiffs have consulted with all counsel of record in this MDL, and are authorized to state that there are no objections to this motion.

### **CONCLUSION**

For the foregoing reasons, Plaintiffs respectfully request the Court order David L. Bryant and GableGotwals serve as Plaintiffs' Lead Counsel and David L. Bryant and Matthew Sill serve as interim class counsel. A proposed Case Management Order No. 4 is being submitted herewith.

Respectfully submitted,

/s/ Adam C. Doverspike

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of December, 2018, I electronically transmitted the foregoing document to the Clerk of the Court using the CM/ECF System for filing as required in the Court's Practice and Procedure Order (MDL Doc. #6 at ¶ 5).

/s/ Adam C. Doverspike

Adam C. Doverspike